

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SIMPY SADANA,

Plaintiff,

-against-

PARK LI, LTD and THOMAS MULLEN,

Defendants.

Case No. 15-CV-8772 (PKC)

**NOTICE OF MOTION TO APPROVE FLSA  
SETTLEMENT**

**PLEASE TAKE NOTICE THAT**, with the consent of Defendants' counsel, Plaintiff moves the Court to enter an Order approving the Parties' Settlement Agreement and Mutual Release as "fair and reasonable" and dismissing this case with prejudice.

**PLEASE TAKE FURTHER NOTICE THAT**, in support of her motion, Plaintiff shall rely upon the annexed Legal Memorandum and Declaration of William H. Healey, Esq.

**KLUGER HEALEY, LLC**  
Attorneys for Plaintiff Simpy Sadana

DATED: January 25, 2016

By: /s/ William H. Healey  
WILLIAM H. HEALEY